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Attorneys for Plaintiffs
TechGuru Consultants, Inc.,
and Alexander Litz

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
TechGuru Consultants, Inc., and Alexander Litz,)	
)	Civil Action No.: 1:16-cv-08777-PGG
Plaintiffs,)	
)	NOTICE OF MOTION TO REOPEN AND
vs.)	SET ASIDE OR VACATE JUDGMENT
)	
Tech Guru, LLC,.)	
)	
Defendant)	
_____)	

PLEASE TAKE NOTICE that, upon the annexed Declaration of David Postolski, Esq., and Alexander Litz, and the Exhibits attached thereto; the memorandum of law in support of the present Motion to Reopen and Set Aside or Vacate Judgment, and the pleadings and prior proceedings herein, Plaintiffs TechGuru Consultants, Inc., and Alexander Litz (“Plaintiffs”) will move the Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007, at a time and date to be determined by the Court, for an Order Reopening the present case and Setting Aside or Vacating the Judgment in this case, which was entered by the Court on April 4, 2019, pursuant to Rule 60 of the Federal Rules of Civil Procedure, and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant shall serve its response by no later than _____, 2020; and Plaintiff shall serve its reply by no later than _____, 2020.

Dated: Summit, New Jersey

April 6, 2020

Respectfully submitted

By: /Sergei Orel/
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Notice of Motion was served on Defendant, c/o its counsel, Sean Ploen, at the below address and email address on this 6th day of April, 2020, at:

Sean Ploen
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